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November 8, 2017

LETTER VIA ECF / ATTACHMENTS HAND-DELIVERED TO CHAMBERS

Hon. P. Kevin Castel
United States District Judge
500 Pearl Street
New York, NY 10007-1312

**Re: *IN RE APPLICATIONS OF APOSTOLOS MANGOURAS*,
Case No. 17 Misc. 00172
Privileged Documents for *In Camera* Review**

Dear Judge Castel:

We represent Respondents in the above-referenced case.

With the hard copy of this letter that is being delivered today to Chambers, we respectfully submit the ten (10) documents designated by counsel for Applicant for *in camera* review from the *Privilege Log Dated October 27, 2017 of Hard-Copy Documents Concerning Witnesses Kostazos, Alevizos and Thuesen in the Files of Respondents Brian D. Starer, Esq. and Squire Patton Boggs (US) LLP as Counsel to the Kingdom of Spain*.

We have been instructed by our client, the Office of the Spanish State Attorney, that production of these ten documents to the Court for *in camera* review will not violate Spanish professional secrecy; however, this production is made: 1) without waiving the rights of the Kingdom of Spain to object to any further disclosure of these documents; and, 2) with the renewed assertion that these documents, and all other documents and testimony sought by Applicant herein are subject to Spanish professional secrecy and therefore must not be disclosed to any person, other than to the Court for the *in camera* review that your Honor has ordered.

In delivering these documents, we wish to emphasize that each of them is clearly exempt from discovery pursuant to the attorney work product doctrine, and that each of them is also exempt from disclosure pursuant to Spanish law. Accordingly, in the event that the Court were to determine, after *in camera* review, that any of the documents should be disclosed to counsel for Applicant, we respectfully submit that such disclosure should be stayed until our motion for a

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stay pending appeal is finally resolved, as disclosure during the pendency of the motion would render the motion moot with regard to the documents thus disclosed.

Our letter to the Court dated August 30, 2013, annexed hereto as Exhibit A, describes the manner in which our Privilege Log was originally prepared, as directed by your Honor in connection with the 2013 Application by the same Applicant (Case No. 1:13-mc-00238 (PKC)).

We finalized our 2013 draft Privilege Log as directed by your Honor at our conference of October 18, 2017, and produced it to counsel on October 27, 2017. A copy is annexed hereto as Exhibit B.

Counsel responded by designating ten documents, as ordered by the Court, for us to submit for *in camera* review. A copy of counsel's letter is Exhibit C, and may serve as a table of contents for the documents themselves, which are side-tabbed with the numbers assigned to them in the Privilege Log.

We are grateful for the Court's courtesies and attention to this matter.

Respectfully,

SQUIRE PATTON BOGGS (US) LLP



Victor Genecin

cc: Thomas L. Tisdale, Esq. (by e-mail w/o attachments)
Sean Sheely, Esq., Holland & Knight LLP (by e-mail w/o attachments)
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